

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANICE A. MOORE, ON BEHALF OF HERSELF
AND A CLASS OF ALL SIMILARLY SITUATED
PARTICIPANTS IN THE VIRGINIA COMMUNITY
BANKSHARES, INC. EMPLOYEE STOCK
OWNERSHIP PLAN,

Plaintiff,

v.

Case No. 3:19-cv-00045

BLUE RIDGE BANKSHARES, INC.,
SUCCESSOR BY MERGER OF
VIRGINIA COMMUNITY BANK, *et al.*,

Defendants.

**PLAINTIFF'S MEMORANDUM IN SUPPORT
OF HER MOTION FOR SUMMARY JUDGMENT**

For the reasons stated in her memorandum of support being filed forthwith, Plaintiff Janice Moore moves for summary judgment on the Defendants' liability for their breaches of their fiduciary duties and engagement in prohibited transactions.

JANICE A. MOORE, ON BEHALF OF HERSELF
AND A CLASS OF ALL SIMILARLY SITUATED
PARTICIPANTS IN THE VIRGINIA COMMUNITY
BANKSHARES, INC. EMPLOYEE STOCK
OWNERSHIP PLAN,

By: /s/ Danny Zemel
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Counsel for Plaintiff Janice A. Moore on Behalf of Herself and a Class of All Similarly Situated Participants in the Virginia Community Bankshares, Inc. Employee Stock Ownership Plan

Certificate of Service

I hereby certify that on this 29th day of June 2023, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system.

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